

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTER DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**LAYTON GILL, Individually and On
Behalf of All Others Similarly Situated,**

Plaintiff,

V.

BULLZEYE OILFIELD SERVICE LLC

Defendant.

CIVIL ACTION NO. 5:15-cv-01166

JURY TRIAL DEMANDED

PLAINTIFF'S DESIGNATION OF EXPERTS

Plaintiff, Layton Gill, hereby designate the following expert witnesses in compliance with the Court's Scheduling Order (Doc. 12):

1. Trang Q. Tran
ttran@tranlawllp.com
Tran Law Firm, L.L.P.
2537 S. Gessner Rd., Suite 104
Houston, Texas 77063
Telephone: (713) 223-8855
Fax: (713) 623-6399

The above referenced attorney is expected to testify as to the reasonableness and necessity of the attorney's fees, costs, and expenses which the prevailing party incurred while prosecuting this claim.

It is anticipated that testimony regarding attorney's fees and costs will be presented to the Court, live or via affidavit, post-trial. It is anticipated that evidence supporting the attorney's testimony will be provided to the opposing counsel before the Court conducts any hearing on the subject-matter of attorney's fees and costs. Plaintiff will supplement prior to trial, if necessary.

II.

Further, Plaintiff may introduce testimony and/or records, including any employment records from any experts who have been identified, or who in the future is identified, as an expert witness by Defendant.

III.

Plaintiff reserves the right to call undesignated rebuttal expert witnesses whose testimony cannot be reasonably foreseen until the presentation of the evidence against Plaintiff.

IV.

Plaintiff further reserves the right to expand reasonably the scope of the opinions and testimony of the above named experts as necessary and/or appropriate and as may be developed during any deposition or trial testimony given herein.

V.

Plaintiff further reserves the right to designate additional experts and or provide reports at a later date, if necessary and/or appropriate, upon receipt of more complete compensation records and compensation related documents from Defendant and more detail as to the opinions and testimony of experts designated by Defendant.

VI.

Plaintiff further reserve the right to supplement the information contained in Plaintiff's Designation of Expert Witnesses as necessary.

Respectfully submitted,

TRAN LAW FIRM L.L.P.

/S/Trang Q. Tran

Trang Q. Tran

Federal I.D: 20361

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was forwarded on Wednesday, November 30, 2016, in the following manner to:

(Via Email or Fax)

GALO LAW FIRM, P.C.

Michael V. Galo, Jr.

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ATTORNEYS FOR DEFENDANT

/S/Trang Q. Tran

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